

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

WILLIAM BERNICE YOUNG,)	Case No. 3:17-bk-08092
)	Chapter 7
Debtor.)	Judge Walker

**OBJECTION TO TRUSTEE’S MOTION TO SELL PROPERTY FREE AND CLEAR OF
LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES**

Comes now Prime Nashville, LLC (“Prime Nashville”), by and through counsel, and files this objection (the “Objection”) to the Trustee’s Motion to Sell Property Free and Clear of Liens, Claims, Interests and Encumbrances (Doc. 77) (the “Motion to Sell”). In support of its Objection, Prime Nashville states as follows:

On June 29, 2018, the Trustee filed the Motion to sell in which he seeks to sell one parcel of real property, located at 1104 Lenore Street, Nashville, Tennessee (the “Property”) to a third party for \$190,000.00.

Prime Nashville is willing to pay \$500,000.00 for the purchase of four parcels of real estate, which includes the Property. Those four parcels are 1104 Lenore, 453 Coventry, 4501 Xavier, and 2419 Emmett (the “Four Parcels”). Using the Trustee’s \$190,000 sales price as the value for the Property, and using the Debtor’s values for the other three properties as disclosed in his statements and schedules, the total value of the Four Parcels is approximately \$508,000.00.

Attached hereto as Exhibit A is Prime Nashville’s purchase offer for the Four Parcels.

WHEREFORE, Prime Nashville respectfully requests that the Court deny the Trustee’s Motion to Sell, approve a sale of the Four Parcels to Prime Nashville, and grant such other relief as the Court deems just.

Dated: July 19, 2018

Respectfully Submitted,

/s/Phillip G. Young, Jr.

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